

Final Determination

Johns Manville International, Inc.
Wool Fiberglass Manufacturing Line
Winder, Georgia (Barrow County)

On April 8, 2003 Johns Manville International, Inc. (JM) submitted an application to revise their Title V air quality permit to operate JM's existing facility near Winder, Georgia. On May 12, 2004, the Division issued a Preliminary Determination stating that the facility's planned retrofit to the raw material handling equipment to allow the inclusion of an oxidation-reduction agent in the raw materials being added to the glass melters for Line # 106, should be approved. The Preliminary Determination contained a draft Title V Air Quality Permit amendment allowing the addition of this reducing agent into line #106.

The Division placed a public notice in a newspaper of general circulation in the county of the proposed facility. Such public notice was placed in The Barrow County News, 189 West Athens Street, Winder, GA 30680

During the 30-day public comment period, the only written comments received were from the Environmental Protection Agency Region IV office. At the conclusion of the public comment period, the EPD held a Public Hearing¹ at the Piedmont Regional Library, 189 Bell View Street, Winder, GA 30680. Verbal comments were received from several citizens. After the hearing, the facility also provided verbal feedback regarding several points made in the Preliminary Determination, asking that EPD clarify their meaning and purpose. There were no changes made to the conditions of the proposed draft permit. Since there were no changes made to the Permit, the Division has determined that the permit can be issued. The comments are addressed in Attachment A.

Included with this Final Determination in Attachment B, is a copy of Title V Air Quality Permit Amendment number 3296-013-0005-V-01-1 as issued by the Division to Johns Manville International, Inc. allowing the oxidation-reduction agent to be introduced into the raw materials being added to the glass melters for Line # 106.

¹ A public information meeting regarding the permit application was also held at the Piedmont Regional Library, Winder, Georgia on Thursday October 9, 2003. During the meeting, individuals made statements, asked questions and requested that EPD hold a Public Hearing.

There are 7 comments and questions that were asked during the public comment period / public hearing and three comments received by EPD several days after the public meeting. None of these comments necessitated any changes to the permit. The comments and the EPD responses to the comments are given below:

Comment 1

1. From: Johns Manville, Per teleconference June 15, 2004.

They objected to EPD characterizing the requested change as a “Change in the Method of Operation” because it implied that any time the facility made a change to the batch formula, it could be considered a “Change in the Method of Operation” and the facility would have to go through PSD. This would be an excessive burden on the facility, when minor changes to the formula must be made as raw material cost and availability change.

1. EPD Response : The PSD Preliminary Determination contains 6 references to “Change in the Method of Operation.” These are highlighted in bold below.

Page 5 of 25 paragraphs #1 and #2.

“SUMMARY

*The Environmental Protection Division (EPD) has reviewed the Johns Manville International, Inc. (JM) PSD application for their existing fiberglass insulation manufacturing facility located in Winder, Georgia. The proposed change is considered a **change in the method of operation**. The change consists of adding an oxidation-reduction agent to the raw materials placed in the two melters of the Line 106 fiberglass insulation manufacturing line.*

*A summary of the net emissions changes from the proposed **change in the method of operation**, and the significant emissions levels as defined by the PSD regulations, is shown in Table 1.”*

Page 5 of 25 paragraph #4.

*“The change in emissions of criteria pollutants, due to the proposed **change in the method of operation**, will also include a very minute increase in the emissions of particulate matter less than 10 micrometers in aerodynamic diameter (PM_{10}), and Sulfur Dioxide (SO_2). SO_2 emissions result from reducing sulfur trioxide (SO_3) to SO_2 .”*

Page 6 of 25 paragraph #2

“As alluded to above it has been determined, through approved modeling techniques, that the

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*estimated emissions increases caused by this proposed **change in the method of operation** will not cause or contribute to a violation of any ambient air standard or allowable PSD increment in the area surrounding the facility.”*

Page 7 of 25 paragraph #2

“1.2 History and Proposal

*On April 8, 2003 Johns Manville International, Inc. (JM) submitted an application to revise their Title V air quality permit to operate equipment at JM’s existing facility near Winder, Georgia. They proposed to **change their method of operation** by retrofitting the raw material handling equipment to allow the inclusion of an oxidation-reduction agent in the raw materials being added to the glass melters for Line # 106”*

The Division did not intend to limit the Facility’s ability to make minor changes to the batch mixture as needed, especially when changes are made to deal with normal variations in market price and in the key ingredients for making the glass for the manufacturing process. These are acceptable as long as these changes do not cause an exceedance of any emission limit contained in the permit.

The Division has reviewed the decision to characterize the proposed change as a “Change in the Method in Operation” and finds that this is incorrect. The necessity to use the additive appears to be inherent in the design of the facility and should not be considered a “change.” However, it did cause a reevaluation of the original Line 106 BACT determination. This permit review was required to make sure that the higher emissions of the CO are allowed as BACT and do not cause a change in CO modeling results.

The Division, therefore agrees that the words “*change in the method of operation*” should instead be “*modification to a BACT limit*” for the first 5 references and the wording “*change their method of operation*” should be “*introduce the agent into the melter*” in the 6th reference.

Comment 2

2. From: Citizen #1, Public Hearing, June 14, 2004.

“The way I understand it, the reason for the request ... is to extend the life of the electrodes. The Environmental Defense Score Card ranked Johns Manville the dirtiest in Barrow County. Air pollution causes health problems from strokes to premature death. SO2 is a known cardiovascular and respiratory irritant and causes acid rain. I think it is a shame that they don’t care for the quality of life, premature death and breathing problems. Are a few electrodes worth more than your health or your life? I ask JM to withdraw this request, should strive not to pollute the way they have in the past. According to the Score Card they are putting out 6 times more

then either of the other two plants on the Buford Highway even before this requested increase.”

2. EPD Response: The EPD has reviewed the application submitted by Johns Manville and has verified that any increase in emissions will not exceed regulatory limits. The two pollutants that will have a modest increase caused by the proposed change are Carbon Monoxide and Sulfur Dioxide. As shown in Table 1 below, the increased emissions from the facility will not cause the ambient concentration of CO to exceed the National Ambient Air Quality Standards (NAAQS).

Table 1 Ambient concentration from maximum CO emissions from JM as compared to the NAAQS	
Maximum CO concentration from JM emissions after change	NAAQS
448 micrograms / cubic meter averaged over one hour.	40,000 micrograms / cubic meter averaged over one hour.
251 micrograms / cubic meter averaged over 8 hours.	10,000 micrograms / cubic meter averaged over 8 hours.

The Environmental Defense² environmental organization’s Environmental Score Card information referenced by the commenter is taken from the EPA Toxic Release Inventory (TRI) data. However, the TRI data is only current to 2001 and does not reflect the change JM made to their fiberglass binder, which had contained phenol formaldehyde, to a less toxic acrylic binder. Table 2 shows that compared to the other two fiberglass manufacturing plants in the state of Georgia, JM is below the average for pollutants emitted, with the exception of VOC. Compared to the other two Georgia fiberglass plants, JM emits much less hazardous air pollutant (HAP) emissions.

Table 2 Normalized Anticipated Actual Emissions per Production Unit For Fiberglass Insulation Manufacturing Plants in Georgia				
Company	CO	SO2	VOC	HAP
JM	1.92	0.11	1.10	0.04
Certainteed (Athens)	1.14	0.65	0.78	0.43
Owens Corning (Fairburn)	2.67	0.16	0.33	0.3

² Environmental Defense is a leading national nonprofit organization representing more than 400,000 members. Environmental Defense was created in 1967. Environmental Defense created and operates the “Scorecard.” The Scorecard provides a collection of environmental information available on the Internet free for the public to use.

Table 2 Normalized Anticipated Actual Emissions per Production Unit For Fiberglass Insulation Manufacturing Plants in Georgia				
Company	CO	SO2	VOC	HAP
Average	2.19	0.19	0.69	0.21

Comment 3

3. From: Citizen #2, Public Hearing, June 14, 2004.

“My main concern is environmental.” ... “The free enterprise system has made us what we are today but we can move forward together.” ... I have found if you want to get to the bottom of anything you follow the money. Money runs the system; we all use it and need it. But if we do not have good clean air and drinking water to drink for us all then the money isn’t worth a damn. I understand that this is a safety issue and that it will help your plant be more efficient. Understanding does not always make it acceptable. As has been asked before “What does this change at the plant do for Barrow County? Draw a line in the sand and be more compatible with the environment. Let’s compromise. At the headwaters for the drinking water of this town are two chemical plants, Johns Manville and a truck wash. That’s not your fault but poor planning on the part of the city and county. But let’s continue to improve the environment. Lead the parade and stop the increase. Withdraw the request; your standing with the community is more important than saving a few dollars. Will you lose some of your market; I don’t think so. Johns Manville has been around a long time. They have had many problems; they don’t have the greatest reputation in the world, but you can start now to improve that. Thank you for listening to my comments.

3. EPD Response: Also see the response to Comment #2. As mentioned after the Public Hearing, the proposed change that JM is requesting is a moderate increase in pollutants from the cleanest, and perhaps most expensive to operate, fiberglass process line in the state of Georgia. The company has stated that the change will help ensure the viability of this process line in the market place.

Comment 4

4. From: EPA, Per Telephone, June 10, 2004.

There is a typo in the PSD Preliminary Determination on page 9 of 25, third sentence. The word “above” probably should be “below.”

4. EPD Response: The Division agrees that this is a typo.

Original sentence in the paragraph

The total increase of CO emissions for Line #106 are well **above** the 100-tpy significant emission rate (see column number 4 of Table 1).

The sentence after the change

The total increase of CO emissions for Line #106 are well **below** the 100-tpy significant emission rate (see column number 4 of Table 1).

Comment 5

5. From: EPA, Memorandum dated June 10, 2004.

On page 5 of the preliminary determination, GEPD states, "The proposed change is considered a change in the method of operation." I agree with this conclusion. Because the project is a change in the method of operation, it triggers a need for a full PSD applicability assessment. Under current GEPD rules, a PSD applicability assessment entails a comparison of past actual emissions to future potential/allowable emissions for all regulated pollutants emitted by the equipment undergoing a physical change or change in the method of operation, or emitted from equipment debottlenecked or experiencing increased utilization as a result of the change.

5. EPD Response: Upon further review of the terminology used, as discussed in the answer given by the Division to Comment #1 above, the term "Change in the method of operation" should not have been used. Only the BACT limit and modeling for CO had to be revisited. Therefore, the overall PSD applicability assessment does not need to be done.

Comment 6

6. From: EPA, Memorandum dated June 10, 2004.

If GEPD believes that the change in method of operation is limited to the Line 106 melters and not to the entire Line 106 production process, then the pollutants that should be included in the PSD applicability assessment are probably carbon monoxide, sulfur dioxide, particulate matter (PM and PM₁₀), and volatile organic compounds. (Please verify this list.) If GEPD believes that the change in method of operation encompasses the entire Line 106 production process, then nitrogen oxides emissions would also be included.

6. EPD Response: The Division believes that the change only affects the Line 106 melters and not any of the other Line 106 components. In any case, Table 1 in the preliminary determination showed that there would be no increase in emissions of PM₁₀, NO_x and VOCs from the process line as a result of this new permit amendment.

Comment 7

7. From: EPA, Memorandum dated June 10, 2004.

We request that GEPD (1) decide on the extent of the change in the method of operation (Line 106 melters only or entire Line 106 production process), (2) provide a justification if the change in method of operation is considered limited to the Line 106 melters only, (3) make a past-actuals-to-future-potentials calculation for all pollutants emitted by the equipment involved in the change, and (4) assess the applicability of PSD review requirements based on the actuals-to-potentials comparison (with netting included if necessary).

7. EPD Response: See the responses to Comments #5 and #6 above.

Comment 8

8. From: Mr. Bill Summerour, email submitted 8:11PM, June 19, 2004.

I am sorry I could not be at the Winder meeting concerning the Manville Company. My health is not at it's best but I have written many letters to many local newspapers about this company! I have also given lectures on the polluting chemicals that are coming from this company and the three other companies located in this same section. This high polluter of our air and water system is an eyesore to the community at large and a cancer risk to anyone living anywhere close to their emissions flow. My farm is located about one half mile, as the crow flies, from this polluter and I can tell you that the smell at certain times of the week and late at night is appalling. If you can't see the problem that Barrow county has with these companies pollutants mixing together in the airways and water runoffs of our county then you are as blind as any other politician with his hand out. The land where Manville is located was once the Summerour Farm. The stream behind these plants, Cedar Creek, is part of our drinking water system. These plants drain into this creek and into the holding pond where the water is drawn to be sent to the Winder water system! It was sold by my grandmother, who was not in her right mind at the time, while I was serving my country in the 1960's. If I had been around those that bought it would have had a different person to confront than an old woman!! I would suggest your doing an air and water test near and far from the plant in question, my farm would be a good place. It seems that every time your agency does a test someone gets the word to Manville and those other accursed plants and their emissions are cut back considerably. I have several moles in these plants and the information I am getting from them tell me a different story then the one you and those fool company heads are saying. If the emissions are so little then why not send it through the entire plant before letting it out into our air supply. Lets see how this goes over with the plant manager. You may reach me at

770-867-8633. I would be more than happy to meet with you along with several interested doctors and environmentalists from Athens and surrounding areas that were not informed of this last meeting. I will be sending them your email address also. I don't give a damn about the future employment at the plant if this emissions permit is not issued. I don't like threats and this sounds like a threat by the plant heads. I certainly hope I hear from you and not one of your underlings as I will be writing many letters to the newspapers in this area concerning you and those plants.

Regards, Bill Summerour
630 Dee County rd.
Winder, Georgia 30680-2700

8. EPD Response: Also see the response to Comment #2 above. The permit contains requirements for the facility to perform stack testing of the exhaust from the Line 106 melters for the pollutants in question, CO and SO2. When the line was initially constructed the construction permit also required stack testing to be performed. Contained in Table 3 below are the results of those tests performed. The results show that the Line 106 melters were operating in compliance with the emission limits imposed by the construction / operating permit.

Table 3 Johns Manville Line 106 Melter Stack Test Results				
Pollutant	Date of Stack Test	Permit Limit*	Test Results (% of limit)	Production Rate During Testing (%)
PM	September 3, 2003	3.247	46.2	73.0
CO	September 3, 2003	1.277	89.9	73.0
NOX	September 3, 2003	0.228	10.09	73.0
VOC	September 3, 2003	3.84	16.93	73.0

*Permit 3296-013-0005-P-012-0

With regard to comments about water pollution, the Air Protection Branch cannot address the water related concerns expressed by the commenter; these have been forwarded to the Water Protection Branch of EPD.

Comment 9

9. From: Mrs. Jill McElheney, email submitted 11:22 AM, June 22, 2004.
Mr. Summerour and I are both concerned about environmental health in Barrow County. While EPD has the job of issuing permits and enforcing existing laws, the health of the people in the

community should be considered. When high rates of chronic disease are documented, EPD should take this into account before issuing permits to increase industry toxicants into the air, water and soil.

As a mother of 5 and an advocate for children's environmental health, I ask that you look into this, and the vulnerability of children to air toxicants. More pollutants will only exacerbate these rates of chronic diseases in adults and children.

By properly examining these concerns of Mr. Summerour and myself, you will be benefiting both industry and the community. Will you please let us know what action you plan to take?

9. EPD Response: Also see the responses to Comments #2 and #8 above. Even though the permit review did not directly consider health-based statistics for Barrow County, the National Ambient Air Quality Standards (NAAQS) are set to protect the public health with an adequate margin of safety. Carbon monoxide (CO), which has an NAAQS, is different from most other air pollutants in its acute effects; though it can cause death in very high concentrations, it is not considered a toxic pollutant.³ Unlike other pollutants, such as toxic air pollutants that can cause permanent health effects from low concentrations, the effects from mild CO exposure are reversible.⁴ The major source of exposure to CO is from automobile, truck and natural gas appliances and heaters in the home. The potential increase in the concentration levels of CO that can be attributed to Johns Manville have been thoroughly studied and found to be well below the NAAQS standards set by the USEPA, as shown in Table 1 of this Final Determination. That said, EPD has reviewed several key health statistics for Barrow County and its neighboring counties to see if there are any increased health issues as was stated by the commenter. Table 4 below contains age-adjusted cancer incidence rates in Barrow County and its neighbors. Barrow County was found very slightly above the Georgia State average and below the national average for cancer. Barrow County did not have the highest rate of cancer, as compared to its neighboring counties, for any of the categories listed in Table 4. CO is not considered a cancer-causing agent but does impair breathing; therefore, a better comparison for CO would be to review the incidence of asthma

³ The worst toxic air pollutants have been identified by EPA as hazardous air pollutants (HAP). These pollutants are known to or "suspected" to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. EPA is working with state, local, and tribal governments to reduce air toxics releases of [188 pollutants](#) to the environment. Examples of toxic air pollutants include benzene, which is found in gasoline; perchlorethylene, which is emitted from some dry cleaning facilities; and methylene chloride, which is used as a solvent and paint stripper by a number of industries. Examples of other listed air toxics include dioxin, asbestos, toluene, and metals such as cadmium, mercury, chromium, and lead compounds." Information source: <http://www.epa.gov/air/toxicair/newtoxics.html#what>

⁴ Air Pollution Control Engineering, Noel Denevers, McGraw-Hill, Inc. ISBN 0-07-061397-4, 1995, Page 19.

attacks. Table 5 contains a comparison of the seven adjoining counties with their asthma related hospitalizations during 1998 through 1999 and the potential CO emissions from stationary sources as shown in Figure 1. This table shows that even though there may be some correlation between CO emissions and the incidence of asthma, there must also be other factors at work. Note the data for Clarke and Hall Counties. Clarke County had the highest asthma hospitalization rate but one of the lowest CO emission rates. On the other hand, Hall County had one of the lowest hospitalization rates yet had one of the highest CO emission rates. Barrow County's asthma hospitalization rate, though slightly higher than the Georgia average, was lower than both Clarke and Jackson Counties. It appears from the health statistical data that Barrow County is not worse than its adjoining counties; EPD therefore concludes that there are no clear health effects caused by Johns Manville operating in Barrow County, as a whole, according to the available health statistics.

Table 4 Age Adjusted Cancer Incident Rates In Georgia 1999 to 2001* For Barrow And Adjoining Counties (number of cases per 100,000 persons)					
County	All Cancers	Breast	Colon / Rectal	Lung / Bronchia	Prostate
Barrow	456.2	121.9	50.6	78.1	144.8
Clarke	447.7	141.9	60.4	65.7	141
Gwinnett	450.4	140.6	44.7	69.7	155.4
Hall	466.5	115.7	50.6	76.8	173.4
Jackson	432.9	102	49	84.5	126.3
Oconee	415	166	48.6	63.1	70.8
Walton	436	116.2	47.2	72.5	147.8
Georgia Average	453.3	123.4	50.4	75.1	164.8
National **Average 1999-2000	468.5	134.9	54.23	62.9	174.2
*Georgia Division of Public Health, Comprehensive Cancer Registry **National Institutes of Health, National Cancer Institute, Surveillance, Epidemiology, and End Results (SEER) Program					

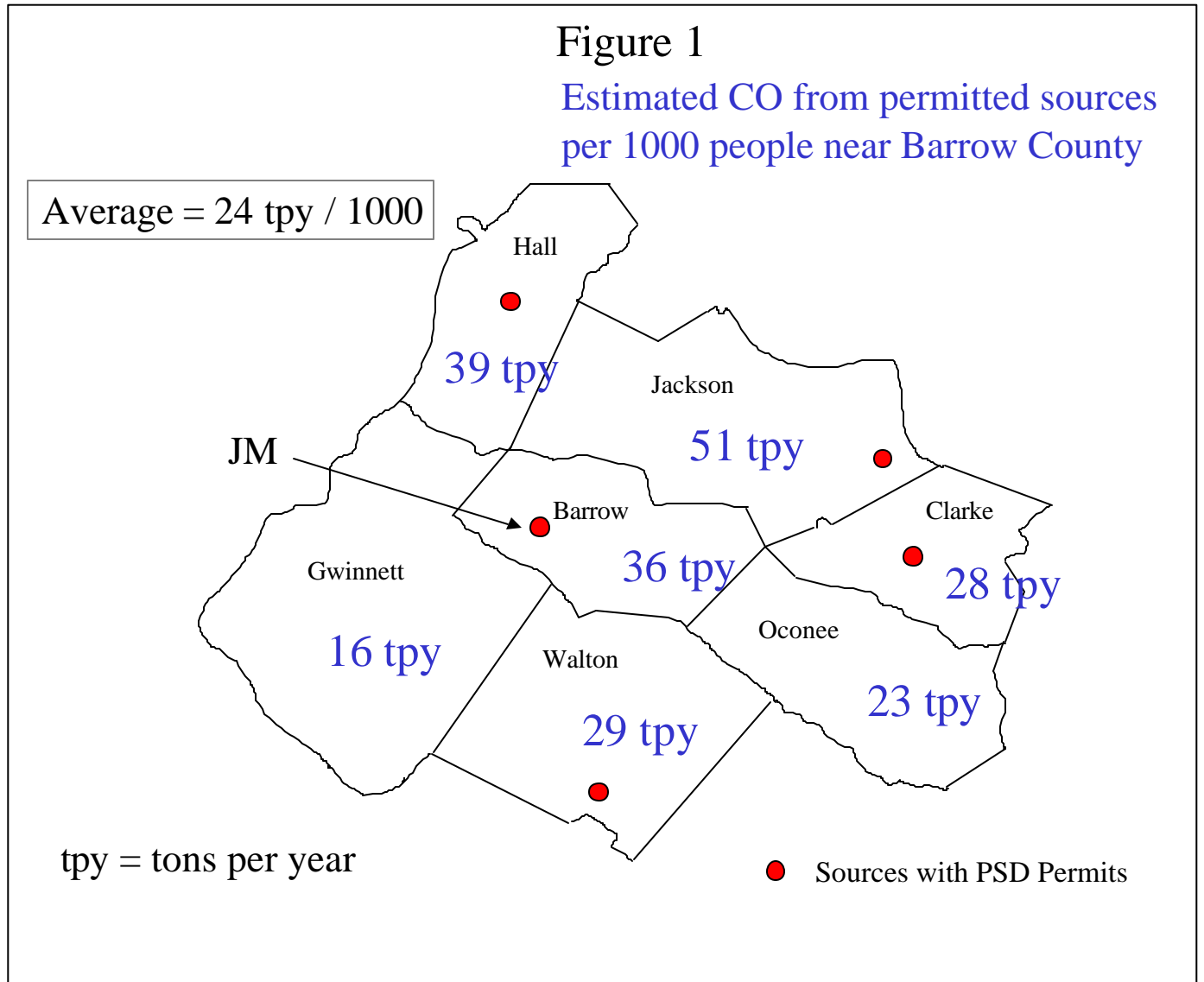


Table 5 Asthma Hospitalization Rates and CO Emission Rates for Barrow County and Adjoining Counties		
County	1998 to 1999* Asthma Hospitalization Rate per 100,000 persons	Estimated CO emission in tons per 1000 persons per year from permitted stationary sources
Barrow	140	36
Clarke	193	28
Gwinnett	97	16
Hall	116	39
Jackson	176	51
Oconee	129	23
Walton	72	29
Georgia	122	N/A
*Asthma In Georgia 2000, Georgia Department of Human Resources and the American Lung Association of Georgia, Inc.		

Comment 10

10. From: Mrs. Kathleen Gill, email submitted 7:23 PM, June 22, 2004.

I just read the article in Sunday's newspaper paper about the EPD hearing last Monday regarding Manville's request to increase emissions from the plant. First - please tell me how this meeting was advertised? I had no idea. I would have been there for sure. PLEASE don't let them increase emissions. I live directly downwind (prevailing) from that factory and since the late 1980's I have NOT BEEN ABLE TO OPEN MY WINDOWS for fear of smelling their trash and being exposed to the toxins. On January 31st (I forget if 1990, or 1991), they had a fire at the factory around 8:00 p.m. or later. They tried to palm it off as one of their constantly recurring stack fires. The then-Winder Fire chief told me himself it WAS NOT a stack fire. THEY responded because the fire was so big. He told me JohnsManville ran him off because they have their own fire-fighters. Manville did not want to chief to see what was actually going on. It was a fire in/around their waste pool. The grasses around the pool caught fire. Their waste pool at the time was not even lined I understand - so who knew what was going into the ground water. Their waste pool was full of heaven knows what. I recall this night vividly because it was my mother-in-law's birthday - we had dinner and were leaving the house to take her home and one breath of the awful air sent me reeling. My lungs were painful for days. My lungs ever since that time have been super-sensitive to chemicals in the air. I discussed this condition with my physician and he said the only way to find out exactly what had happened to my lungs would be too intrusive. I complained

and begged and pleaded and hounded and did everything I could with the EPA, but was told it was too expensive to test for air quality - that EPA couldn't do that - no one would do it. I was pretty much dismissed - I suppose as a crank. I complained to Manville employees for years and then finally they paid to install a dozen leyland cypress trees on my property to filter any smog that may come my way. Of course, I will be long dead before those trees ever get to a size to really do any sort of good anyway. PLEASE - PLEASE - PLEASE DO NOT ALLOW THEM TO INCREASE POLLUTION IN THIS AREA. Money or no money - how many more people must die. It is a fact that Manville employees have a higher lung cancer death rate than other employers in the area. Everybody knows that. It is a fact that the area surrounding Manville has a higher lung cancer rate than other areas of the county. That's quite a coincidence. The new pollutants will not cause cancer but can cause respiratory problems???? No one has asked me if I care to have any additional respiratory problems. Who are they to arbitrarily put me at risk? Who decided that I am to be punished for something? - for what? for not having enough money to personally sue them? For not having enough money to move away? If they're so concerned about money - perhaps they should offer to buy me out as well as offering to buy out all the others within range. How about if those big shots from Manville buy homes and move in their children downwind of the factory BEFORE they increase emissions. Are they willing to do that? Are they willing to bring their families here? If they demonstrate their own willingness to live downwind from the problem, then maybe there really is no risk. But, we all know that will never happen. Millions spent in 2002 - swell - what's the big deal - that's their moral obligation. Why did it take so long for them to take a little responsibility for what they do and have done. They have been directly responsible for killing people for years. If this permit is not issued - is that really enough to make them close down? WE SHOULD BE SO LUCKY. They are trying to use smoke and mirrors. It's just the easy way for them to move their profits in an upward fashion. PLEASE protect me. I obviously can't do anything to protect myself from them. I must look to you to protect me and the others who live here. I want to open my windows. - I want to be able to breathe. Who are they to confine me to my home? What rights do I have? PLEASE protect us. After reading the article, I'm not sure you are in the "protecting" mode - it sounded from quotes, that the EPD is ready to issue the permit - making excuses about the affects of the pollutants. If the pollutants are bad enough to require a special permit - then they are bad enough to be avoided. PLEASE DO NOT ISSUE THE PERMIT. PLEASE protect us.

Sincerely,

Kathleen Gill

10. EPD Response: Also see the reponses to Comments #2, #8 and #9 above. This permit action is only an air quality permit and does not address the groundwater concerns raised by commenters.

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As previously mentioned in EPD's response to Comment #8, the Air Protection Branch cannot address water related issues and concerns expressed by the commenter, so these have been forwarded to the Water Protection Branch of EPD.

The current air quality permitting action is related to a production line installed in 2000 and therefore has no relation to the fire that occurred in the early 90's mentioned in the comment above.

Concerning the commenter's assertion that there are higher lung cancer rates around the Johns Manville plant than the rest of Barrow County has not been addressed. EPD's response to comment #9 does address lung cancer in Barrow County, as a whole, as compared to the rest of Georgia and the Nation. The data in Table 4 shows that Barrow County, as a whole, has slightly higher than average lung / bronchia cancer rates than the nation and the state. It should be noted that Barrow County's neighbor, Jackson County, had a higher lung / bronchia cancer rate than Barrow County. To Johns Manville's credit, the emissions of formaldehyde, suspected of causing lung cancer⁵, have been eliminated from their process.

The commenter asked, "*First - please tell me how this meeting was advertised?*" The EPD made a significant effort to include the public in the air quality permitting process. Over the past 4 years the EPD has had 3 formal public reviewing periods concerning the new 106# Line. For each of these reviewing periods a public notice was published in the county legal organ a local newspaper in the Winder, Georgia area. Table 6 contains a historical account of the public additional participation activities concerning the current application number 14422.

⁵Toxicological Profile for Formaldehyde, U.S. Department of Health and Human Service, Public Health Service, Agency for Toxic Substances and Disease Registry, July 1999.

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Table 6 Historical Account of Public Participation Concerning Application 14422.		
Event	Discussion	Date
EPD receives application	Application to add the oxidation reduction agent to the Line #106 melters	April 6, 2003
Public Advisory construction permit	A public advisory sent to concerned citizens, and local community leaders.	July 14, 2003
Public Comments Received	Several phone calls were received concerning the Public Advisory requesting a Public Hearing.	July and August 2003
Public Meeting Publicized	The air protection branch sent an official press release, publicizing the meeting, to the four newspapers with circulation in the area where the Johns Manville Fiberglass facility is located. They were the Barrow County News, the Atlanta Journal & Constitution, the Gwinnett Daily Post and the Athens Banner-Herald. As a result, both the Barrow County News and the Athens Banner-Herald published stories announcing the meeting.	September 29, 2003
	At the request of LeAnne Turner, editor for the Barrow County News, the outreach materials for the information meeting (Q&A's, fact sheet etc...) were sent to the newspaper. They were published in another issue of the paper that ran the same week as the meeting announcement.	October 1, 2003
Public Information Meeting Held	Meeting held at the Piedmont Regional Library, Winder, GA 7:00PM to 8:45PM. Seventeen citizens attended the public information meeting.	October 9, 2003
Newspaper Article	The Barrow Daily New prints an article about the Public Meeting	October 11, 2003
Notice	EPD finalizes the draft PSD Construction / Title V Operating permit and publishes in the newspaper a notice concerning these documents. The PSD Preliminary Determination, Title V Permit and Public Hearing Notice are made available on the GA DNR Webb page.	May 13, 2004
Public Hearing	Hearing held at the Piedmont Regional Library from 7:00PM to 8:45PM. Five citizens attended the public hearing.	June 14, 2004
Newspaper Article	Article published in the Barrow County News discussing the public hearing.	June 20, 2004

Below is an explanation of the two forms of public participation notification that were used to involve the public:

Public Advisory

Public Advisories are simple notifications made via mail and email to concerned citizens and local community leaders that the Air Protection Branch has received an application to construct or modify. In this case, 51 advisories were sent by mail and 29 by email to individuals and organizations, including the following:

- Legislators
- Legal Organ (the Barrow Daily News)
- Mayor of Winder

Board of Commissioners for Barrow County
Other interested parties (concerned citizens, businesses, etc.)

The public advisory sent during the week of July 14, 2003 concerning permit application number 14422 is shown in Figure 2.

Figure 2

EPD Public Advisory
Air Protection
For the Week of July 14, 2003

SIP PUBLIC ADVISORIES

Barrow

Facility Name: Johns Manville Corporation

Application No. 14422

Facility Address: 713 Bankhead Highway, Winder, Georgia 30680

Description of Operation: Fiberglass Manufacturing

Reason for Application: The facility proposes changing some materials introduced into the glass melters. These changes will increase Carbon Monoxide and Sulfur Dioxide emissions

Public Notice

Public Notices are published in the legal organ, soliciting public input during a 30-day comment period. A draft permit is made available for public review during the comment period. The legal organ is a local newspaper that is designated by the Georgia Secretary of State as the news medium that must be used to advertise when state business will affect that county.

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